## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

REGINAL BEY-WRIGHT,

Plaintiff,

v.

\$ CASE NO. 1:07cv1056-TFM

ARMY FLEET SUPPORT, LLC,

Defendant.

\$

## UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANT TO FILE RESPONSIVE PLEADINGS TO COMPLAINT

Comes now Defendant Army Fleet Support, LLC, ("Defendant"), and respectfully moves the Court to enter an Order extending for ten business day, until January 11, 2008, the time within which Defendant must answer or otherwise respond to the Complaint in this action. In support of this Motion, Defendant shows unto the Court as follows:

- 1. This is a six-count action for alleged racial discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964, as amended; discrimination and retaliation on the basis of race in violation of 42 U.S.C. §1981; negligent supervision and training; negligent retention; and alleged negligence by Defendant.
- The summons and complaint were served on Defendant on December 7,
   2007.
- 3. Counsel for Defendant will not have adequate time to study the allegations made in the Complaint, obtain information from Defendant, research applicable law, and

prepare responsive pleadings by December 27, 2007, the date presently set for answering or filing responsive pleadings to the Complaint.

- 4. No prior extension of time to answer or otherwise plead has been requested or granted.
  - 5. The granting of this requested extension will not prejudice the Plaintiff.
  - 6. Plaintiff's counsel does not object to this extension.

Respectfully submitted this 20<sup>th</sup> day of December 2007.

ARMBRECHT JACKSON LLP Post Office Box 290 Mobile, Alabama 36601 Phone: (251) 405-1302

Facsimile: (251) 432-6843

By /s/ Kirk C. Shaw (SHAW0466)

Attorney for Army Fleet Support LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filings to the following:

Maricia Woodham, Esq. Sabel & Sabel, P.C. 2800 Zelda Road, Suite 100-5 Montgomery, AL 36106

s/ Kirk C. Shaw (SHAWK0466)